

REMARKS

Amendments to the claims

The language of claims 1, 11, 21 and 31 has been amended for clarity purposes. These amendments are supported by the specification as filed, in particular Fig. 1 and the corresponding portion of the specification. No new matter has been added.

Rejection under 35 U.S.C. 101

Claims 1-40 stand rejected because the invention is directed to non-statutory matter. In particular, the Examiner asserts that claims 1-40 fail to set forth physical structures or materials comprising hardware or a combination of hardware to produce a "useful, concrete and tangible" result. Accordingly, Applicants have amended independent claim 1 to recite "*A method of generating a sound from a URL, comprising:*

receiving a URL comprised of a sequence of character subsets;

in a mapping block, electronically mapping the subsets of characters of the URL to sound features in a sound output so that at least certain character combinations that occur frequently in URLs are mapped to sound sequences of a musical character; and

outputting the sound features."

Applicants respectfully submit that claim 1 now sets forth at least one physical structure: a mapping block (block 5 of Fig. 1). Paragraph [0029] of the specification recites that mapping can be implemented either by using lookup tables or transformation functions. Lookup tables are stored in a memory and it is well known in the art that transformation functions are implemented by a processor. Applicants therefore submit that a mapping block for conducting a mapping, as supported by the specification, comprises a memory device or a processor device and is thus a physical structure. Further, Applicants submit that claim 1 now clearly recites "useful, concrete and tangible" result of the operation of said physical structure (a URL is received, a corresponding sound output is output).

Claims 11, 21 and 31 have been amended consistently. Applicants respectfully submit that claims 1, 11, 21, 31 now comply with the requirements of 35 U.S.C. 101. Applicants further submit that at least in view of their dependency on claims 1, 11, 21,

31, dependent claims 2-10, 12-20, 22-30 and 32-40 comply with the requirements of 35 U.S.C. 101. Accordingly, Applicants respectfully request the Examiner to withdraw this rejection of claims 1-40.

Rejection under 35 U.S.C §103

Claims 1-2, 5-7, 9-12, 15-17, 19-22, 25-27, 29-32, 35-37 and 39-40 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Pat. No. 5,903,727 to Neilsen, in view of U.S. Pat. No. 6,643,621 to Dodrill. Claims 3-4, 8, 13-14, 18, 23-24, 28, 33-34 and 38 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Neilsen in view of Dodrill and further in view of U.S. Pat. No. 6,263,313 to Milsted. Applicants respectfully disagree.

Rejection of claim 1

In page 3 of the Action, the Examiner asserts that Neilsen discloses "a method of encoding a URL in sound, wherein the characters of the URL are mapped to sound features in a sound element (i.e., URL with audio file for sound element)(col. 3, line 60 – col.4, line 10)". Applicants respectfully disagree: Neilsen discloses (col. 3, lines 60-65) a "URL 211 of an audio file" allowing a browser displaying a web page to retrieve the audio file from a server storing the audio file, and thus discloses associating a URL to an audio file.

However Applicants submit Neilsen discloses associating a whole URL to an audio file, not "*subsets of characters of the URL to sound features in a sound output*", and can therefore not be deemed to disclose or suggest "*mapping the subsets of characters of the URL to sound features in a sound output*" as recited in claim 1.

Dodrill discloses URLs associated to web pages (column 1, lines 40-44) as well as URLs associated to "audio data, graphic data, text data, video data and so forth within the web page" (column 1, lines 32-39). Dodrill discloses whole URLs associated to audio files, not "*subsets of characters of the URL*" associated "*to sound features in a sound output*", and can therefore not be deemed to disclose or suggest "*mapping the subsets of characters of the URL to sound features in a sound output*" as recited in claim 1.

Applicants submit that in view of the above, no combination of Neilsen and Dodrill would have led one of ordinary skill in the art to a method as claimed in claim 1, and in particular comprising "*mapping the subsets of characters of the URL to sound features in a sound output*" as recited in claim 1. Applicants submit that at least in view of the above claim 1 is patentable over Neilsen in view of Dodrill.

Rejection of claim 11

It has been shown above that Neilsen and Dodrill disclose a URL of an audio file allowing a browser displaying a web page to retrieve the audio file from a server storing the audio file. However, Applicants submit that Neilsen or Dodrill do not disclose generating the URL from the audio file. Further, Applicants submit that Neilsen or Dodrill do not disclose "*receiving a sound sequence comprised of sound features*" or "*mapping the sound features of the sound sequence to characters forming a URL*" as recited in claim 11. Applicants therefore submit that claim 11 is patentable over Neilsen in view of Dodrill. Should the Examiner disagree, Applicants respectfully request him to clearly and specifically point out where Neilsen or Dodrill disclose the above feature in accordance with 37 C.F.R. 1.104(c)2.

Rejection of claims 21 and 31

The arguments above can be used to show that Neilsen and Dodrill fail to disclose or suggest, taken separately or in combination, an apparatus comprising "*a mapping block for electronically mapping the subsets of characters of the URL to sound features in a sound output*" as recited in claim 21, or an apparatus comprising "*a mapping block for electronically mapping the sound features of the sound sequence to characters forming a URL*" as recited in claim 31. Applicants therefore submit that claims 21 and 31 are patentable over Neilsen in view of Dodrill. Should the Examiner disagree, Applicants respectfully request him to clearly and specifically point out where Neilsen or Dodrill disclose the above feature in accordance with 37 C.F.R. 1.104(c)2.

Rejection of claims 2, 5-7, 9-10, 12, 15-17, 19-20, 22, 25-27, 29-30, 32, 35-37 and 39-40

Claims 2, 5-7 and 9-10 depend on claim 1; claims 12, 15-17 and 19-20 depend on claim 11; claims 22, 25-27 and 29-30 depend on claim 21 and claims 32, 35-37 and 39-40 depend on claim 31. Applicants submit that at least in view of their dependency, claims 2, 5-7, 9-10, 12, 15-17, 19-20, 22, 25-27, 29-30, 32, 35-37 and 39-40 are patentable over Neilsen in view of Dodrill.

Rejection of claims 3-4, 8, 13-14, 18, 23-24, 28, 33-34 and 38

Claims 3-4 and 8 depend on claim 1; claims 13-14 and 18 depend on claim 11; claims 23-24 and 28 depend on claim 21 and claims 33-34 and 38 depend on claim 31. Applicants submit that the Examiner has failed to show that Milstead discloses or suggest a method comprising "*mapping the subsets of characters of the URL to sound features in a sound output*" as recited in claim 1 or comprising "*receiving a sound sequence comprised of sound features*" or "*mapping the sound features of the sound sequence to characters forming a URL*" as recited in claim 11, or an apparatus comprising "*a mapping block for electronically mapping the subsets of characters of the URL to sound features in a sound output*" as recited in claim 21, or comprising "*a mapping block for electronically mapping the sound features of the sound sequence to characters forming a URL*" as recited in claim 31. Applicants therefore submit that the Examiner has failed to show that a combination of Neilsen, Dodrill and Milstead would have led one of ordinary skill in the art to a method as recited in claims 1 or 11, or to an apparatus as recited in claims 21 or 31, and submit that claims 1, 11, 21 and 31 are patentable over Neilsen in view of Dodrill and further in view of Milstead. Applicants further submit that at least in view of their dependency, claims 3-4, 8, 13-14, 18, 23-24, 28, 33-34 and 38 are patentable over Neilsen in view of Dodrill and further in view of Milstead. Should the Examiner disagree, Applicants respectfully request him to clearly and specifically point out where any of Neilsen, Dodrill or Milstead discloses the above feature, in accordance with 37 C.F.R. 1.104(c)2.

Applicants whish to draw the attention of the Examiner to U.S. Pat. No. 6,061,738 to Osaku et al. that has been cited against U.S. patent application number 10/005,379 to the same assignee, for "SOUND LINKS". Applicants submit that the claims are patentable over Osaku.

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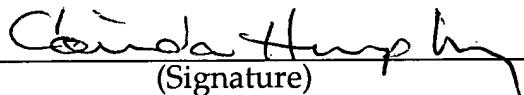
In view of the above, Applicants submit that the application is now in condition for allowance and respectfully urge the Examiner to pass this case to issue.

The Commissioner is authorized to charge any additional fees that may be required or credit overpayment to deposit account no. 08-2025. In particular, if this response is not timely filed, the Commissioner is authorized to treat this response as including a petition to extend the time period pursuant to 37 CFR 1.136(a) requesting an extension of time of the number of months necessary to make this response timely filed and the petition fee due in connection therewith may be charged to deposit account no. 08-2025.

I hereby certify that this correspondence is being deposited with the United States Post Service with sufficient postage as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on

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Corinda Humphrey
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(Signature)

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(Date)

Respectfully submitted,



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